

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-9-E**

IN RE: South Carolina Electric & Gas)
 Company's Integrated Resource Plan) **INTERVENOR, SOUTH CAROLINA**
 (IRP)) **SOLAR BUSINESS ALLIANCE, INC.'S**
) **FIRST**
) **REQUEST FOR PRODUCTION**
)

**TO: K. CHAD BURGESS, ESQUIRE, ATTORNEY OF RECORD FOR SOUTH
CAROLINA ELECTRIC & GAS COMPANY:**

Intervenor, South Carolina Solar Business Alliance, Inc., (hereinafter as, "SCSBA", pursuant to Reg. 103-833, hereby serves, **South Carolina Electric & Gas Company**, (hereinafter as, "SCE&G") with SCSBA's First Requests for Production, to be answered separately within twenty (20) days from the date of service hereof. Please set forth SCE&G's answers separately, after restating the question.

This Request for Production shall be deemed continuing, and if complete production to any of them is not presently available, and the information becomes available before trial, supplemental production is required at such time as this information becomes available to Plaintiff.

IF SCE&G CONTENDS THAT ANY OF THE REQUESTED MATERIAL NEED NOT BE PRODUCED, IDENTIFY SUCH MATERIAL AND SET FORTH THE BASIS FOR SCE&G'S CONTENTION IN ACCORDANCE WITH RULE 26(b)(5) OF THE SOUTH CAROLINA RULES OF CIVIL PROCEDURE.

INSTRUCTIONS

IT IS HEREIN REQUESTED:

1. That all information shall be provided to the undersigned in the format as requested.
2. That all responses to the below Requests for Production shall be labeled using the same numbers as used herein.
3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to these Requests for Production in the appropriate sequence.
4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.
5. That all exhibits be reduced to an 8 1/2" x 11" format.

6. That each Request be reproduced at the beginning of the response thereto.
7. That SCE&G provides the undersigned with responses to these Requests for Production as soon as possible but **not later than twenty (20) days from the date of service hereof.**
8. If the response to any Requests for Production is that the information requested is not currently available, state when the information requested will become available.
9. These Requests for Production shall be deemed continuing so as to require SCE&G to supplement or amend its responses as any additional information becomes available up to and through the date of trial.
10. If a privilege not to answer a Request is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.
11. If a refusal to respond to a Request is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.
12. Answer each Request on the basis of the entire knowledge of SCE&G, including information in the possession of SCE&G or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.
13. If any Request cannot be answered in full, respond to the extent possible and specify the reasons for SCE&G's inability to produce.
14. **Please provide copies of the information responsive to this request in electronic working spreadsheet (Microsoft Excel) format with all data and formulas intact, to the extent feasible.**

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. **"You" or "your" shall refer to, SCE&G.**
2. **The conjunctions "and" and "or" shall be interpreted** in each and every instance as meaning "and/or" and shall in neither instance be interpreted disjunctively to exclude

any document or information otherwise within the scope of any description or request made herein.

3. **“Document” shall mean** all originals of any nature whatsoever, identical copies and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in SCE&G’s possession, custody or control, or other tangible objects regardless of where located; including, without limiting the generality of foregoing, punch cards, print-out sheets, movie film, slides, photographs, records, work papers, source documents, microfilm, notes, letters, memoranda, ledgers, worksheets, books, magazines, notebooks, diaries, calendars, appointment book registers, charts, cable, papers, agreements, contracts, purchase orders, acknowledgements, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meeting of any kind, correspondence, telegrams, drafts, data processing disks or tapes, or computer-produced interpretations thereof, instructions, announcements, schedules, and price list. Media includes data on computers, laptop computers, netbook computers, cell phones, telephones, PDA’s, Blackberry’s or Blackberry type devices, smart phones, external hard drives and flash drives or storage devices of any type, of SCE&G and specifically includes the computer and or laptop computers utilized by Representatives of SCE&G. Media means media, as broadly as the term “media” may be defined, that contains electronic data, as to the Interaction between SCSBA and SCE&G.

4. **“Identify” or “identity”** used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the same time in question.

5. **“Identify” or “identity”** used with reference to a writing means to state the date, author, type of document (e.g. letter, memorandum, telegram, chart, note, application, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in SCE&G’s possession or subject to their control, state what disposition was made of the document(s).

6. All references to the singular contained herein shall be deemed to include the appropriate plural number and all references to the plural shall be deemed to include the singular. All references to the masculine gender contained herein shall be deemed to include the appropriate feminine and neuter genders.

FIRST REQUEST FOR PRODUCTION

1. Please provide copies of all documents that You relied upon in completing SCE&G's answers to South Carolina Solar Business Alliance, Inc.'s First Set of Interrogatories.

2. Please provide copies of all documents You used or relied upon in developing SCE&G's Demand and Energy Forecast, as set forth on pages 3-11 of SCE&G's 2018 Integrated Resource Plan ("IRP").

3. Please provide copies of all documents that contain Your hourly system load data for the year 2016, including (but not necessarily limited to) the data submitted by SCE&G on FERC Form No. 714. Please provide this data in an Excel worksheet, or using an Excel-compatible file format.

4. Please provide copies of all documents that contain SCE&G's hourly system load data for the year 2017, including (but not necessarily limited to) the data required to be submitted by SCE&G on FERC Form No. 714. Please provide this data in an Excel worksheet, or using an Excel-compatible file format.

5. Please provide copies of all documents that contain SCE&G's hourly system load data for 2018 (or any portion thereof), including (but not necessarily limited to) the data SCE&G anticipates will be submitted by SCE&G on FERC Form No. 714. Please provide this data in an Excel worksheet, or using an Excel-compatible file format.

6. Please provide copies of all documents used in the preparation of the chart shown on page 6 of SCE&G's 2018 Integrated Resource Plan (including, but not limited to, an Excel-compatible file containing the data displayed in this chart).

7. Please provide copies of all documents used in the preparation of the chart shown on page 4 of SCE&G's 2017 Integrated Resource Plan (including, but not limited to, an Excel-compatible file containing the data displayed in this chart).

8. Please provide copies of all documents You relied on in making the following statements in SCE&G's 2017 Integrated Resource Plan:

SCE&G usually peaks in the summer as seen in the following chart. This is reasonable for several factors. First, the climate in SCE&G's service area is generally hotter in the summer than colder in the winter in the sense that kWh sales are about 15% higher in the summer than winter. Second, the penetration of air-conditioners among SCE&G's customers approaches 100% since there are no real substitutes for electric air-conditioners at present. Finally, a large number of electric customers heat their homes and/or businesses with natural gas. Results of the peak demand forecast methodology used herein show that the general pattern of higher summer peaks relative to winter peaks will continue.

9. Please provide copies of all documents relating to SCE&G's decision to not include statements similar to those quoted in Request 8 in SCE&G's 2018 Integrated Resource Plan.

10. Please provide copies of all documents related to Your records and forecasts of the relative magnitude of SCE&G's summer and winter system peaks from 1990 through the 15-year period analyzed in the 2018 IRP.

11. Please provide copies of all documents related to Your records and forecasts of the impact of increased solar generation on the size of SCE&G's summer peaks from 1990 through the 15-year period analyzed in the 2018 IRP.

12. Please provide copies of all documents related to Your records and forecasts of the impact of increased solar generation on the timing of SCE&G's summer peaks from 1990 through the 15-year period analyzed in the 2018 IRP.

13. Please provide copies of all documents related to Your records and forecasts of the impact of increased solar generation on the size of SCE&G's winter peaks from 1990 through the 15-year period analyzed in the 2018 IRP.

14. Please provide copies of all documents related to Your records and forecasts of the impact of cooling degree days as they pertain to SCE&G's system load, including (but not necessarily limited to) any documents showing the temperatures within SCE&G's service territory during 2014-2018 or any portion thereof.

15. Please provide copies of all documents related to Your records and forecasts of heating degree days as they pertain to SCE&G's system load, including (but not necessarily limited to) any documents showing the temperatures within SCE&G's service territory during 2014-2018 or any portion thereof.

16. Please provide copies of all documents related to SCE&G's existing Load Management or Demand Response programs.

17. Please provide copies of all documents related to potential new or expanded Load Management or Demand Response programs.

18. Please provide copies of all documents related to SCE&G's existing interruptible load program (but excepting customer-specific communications, forms or applications, bills, contracts, and payment records), including (but not limited to) documents showing the extent of customer participation in this program, and any documents relating to, or which could be used to evaluate, the potential for expanding participation in this type of program.

19. Please provide copies of all documents used in the preparation of the table on page 11 of SCE&G's 2018 Integrated Resource Plan, including (but not limited to) the data and workpapers supporting this table.

20. Please provide copies of all documents related to SCE&G's evaluation of winter peak clipping programs, including (but not limited to) direct load control, voltage conservation, a winter only interruptible load program, a critical peak pricing program or any other program that is designed to reduce or ameliorate winter peaks.

21. Please provide copies of all other documents (not previously provided) related to SCE&G's interruptible program for large customers as referenced on page 11 of SCE&G's 2018 Integrated Resource Plan, including (but not limited to) documents relating to the structure of the program, the cost of the program, the program's popularity or acceptance rate, and lessons learned from the program (but excepting customer-specific communications, forms or applications, bills, contracts, and payment records).

22. Please provide copies of all documents related to SCE&G's existing standby generator program (as referenced on page 11 of SCE&G's 2018 Integrated Resource Plan) including (but not limited to) documents relating to the structure of the program, the cost of the program, the program's popularity or acceptance rate, and lessons learned from the program (but excepting customer-specific communications, forms or applications, bills, contracts, and payment records).

23. Please provide copies of all documents related to anticipated changes in the timing of peak hourly usage on SCE&G's system, including (but not limited to) the anticipated impact of increases in the amount of solar energy generated "behind the meter" (but excepting customer-specific communications, forms or applications, bills, contracts, and payment records).

24. Please provide copies of all documents related to anticipated growth in utility scale solar on SCE&G's system, including (but not limited to) documents relating to the rate of growth during specific time periods, documents related to the dates when individual projects are expected to be, or are likely to be completed, documents related to the likelihood that individual projects will be completed or withdrawn, documents indicating the amount of energy SCE&G anticipates receiving from utility scale solar projects during specific years (or other time periods), and documents indicating what portion of the 4,691 MW of "In-Progress" projects SCE&G anticipates will be completed or withdrawn (but excepting project-specific communications, applications, bills, contracts, and payment records).

25. Please provide copies of all documents used by You to determine the impact of weather conditions on solar generation, including (but not limited to) the correlation between solar generation and cooling degrees.

26. Please provide copies of all documents used by You to determine the correlation between variations in system load and variations in solar generation, including (but not limited to) the tendency for solar generation to decrease on days with heavy cloud cover and the tendency for cloud cover to reduce ambient temperatures.

27. Please provide copies of all documents used by You to determine the relationship between solar name plate capacity and solar output for purposes of the IRP or other resource plans.

28. Please provide copies of all documents used by You to determine the relationship between solar output and system load, including but not limited to any documents showing the metered output of individual solar facilities on specific hours of specific days.

29. Please provide copies of all of the data, analyses and calculations which You developed or considered in arriving at Your analysis of the relative magnitude of summer and winter peaks over the IRP planning period.

30. Please provide copies of all of the data, analyses and calculations which You used to determine the anticipated impact of increased solar generation on hour-by-hour load patterns on SCE&G's system for purposes of the IRP or other resource plans.

31. Please provide a copy of all documents relating to your decision to assume that "35% of this capacity is assumed firm and therefore reflected in the resource plan" as stated on page 40 of your 2018 IRP, including (but not limited to) any internal correspondence, emails or comments embedded within draft versions of the 2018 Integrated Resource Plan which led up to the decision to use this 35% solar capacity ratio, rather than some other alternative.

32. Please provide a copy of the contract to acquire the Columbia Energy Center, as referenced on page 40 of your 2018 Integrated Resource Plan, and shown on line 9 of the table on page 42 of your 2018 Integrated Resource Plan.

33. Please provide a copy of all correspondence since January 2016 between you and Columbia Energy LLC, its parent, affiliates, employees, officers, directors, agents, consultants, attorneys or any other person acting or purporting to act on behalf of the owner of the Columbia Energy Center.

34. Please provide a copy of all reports, analyses, or other documents that were provided to Your senior management for their review and consideration with respect to the potential acquisition of the Columbia Energy Center.

35. Please provide a copy of all documents relating to alternatives to combined cycle plants that You considered while developing your 2018 Integrated Resource Plan, including (but not limited to) firm purchases, acquisition of other types of generating capacity, and Demand Side Management.

36. Please provide a copy of all documents related to opportunities to purchase firm energy or capacity, including (but not limited to) correspondence or other inquiries to or from the owners or managers of merchant generating plants in South Carolina or other states.

April 26, 2018
Columbia, South Carolina

/s/

Richard L. Whitt,
Timothy F. Rogers,
AUSTIN & ROGERS, P.A.,
508 Hampton Street, Suite 203
Columbia South Carolina, 29201
(803) 256-4000
Counsel for South Carolina Solar Business Alliance,
Inc.